1 2	BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.				
3	Andrew S. Friedman (admitted pro hac vice)				
4	Wendy J. Harrison (CA SBN 151090) 2901 North Central Avenue, Suite 1000				
	Phoenix, Arizona 85012				
5	(602) 274-1100				
6	RODDY KLEIN & RYAN				
7	Gary Klein Shennan Kavanagh				
8	727 Atlantic Avenue				
9	Boston, MA 02111-02810 (617) 357-5500 ext. 15				
10	, ,				
11	Co-Lead Interim Class Counsel				
12					
13	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA				
14					
15	In re: WELLS FARGO MORTGAGE) LENDING PRACTICES LITIGATION)	M:08-CV-01930-MMC			
16					
17	This document relates to	STIPULATION TO MODIFY PRETRIAL ORDER ON CASE			
18	ALL ACTIONS (MANAGEMENT			
19	Ś	Judge: Honorable Maxine M.			
20	Ś	Chesney			
21					
22	WHEREAS, on May 13, 2008, the Court entered the Amended Pretrial				
23	Order on Case Management establishing a pretrial schedule in these MDL				
24	proceedings;				
25	WHEREAS, on May 20, 2008, the Court entered its Order for the parties to				
26	proceed before a private mediator for settlement purposes;				
27					
28					

1 WHEREAS, the parties have agreed to proceed to mediation before the Hon. Ronald M. Sabraw (Ret.) of JAMS, who has scheduled an initial mediation session 2 3 to take place on August 28, 2008; 4 WHEREAS, the parties believe that an adjustment of the existing pretrial 5 schedule extending the deadlines previously established by the Court will facilitate the settlement process and potentially avoid the unnecessary expenditure of the parties' resources; 7 8 NOW, THEREFORE, the parties stipulate and respectfully request the Court 9 to extend each of the existing pretrial deadlines for a period of 90 days. For the Court's convenience, the parties have lodged a [Proposed] Amended Pretrial Order on Case Management herewith. 11 12 DATED this 24th day of July, 2008. 13 BONNETT, FAIRBOURN, FRIEDMAN, & BALINT, P.C. 14 15 /s Andrew S. Friedman Andrew S. Friedman 16 Wendy J. Harrison 2901 North Central Avenue, Suite 1000 17 Phoenix, Arizona 85012 18 19 **RODDY KLEIN & RYAN** 20 /s Gary Klein 21 Gary Klein Shennan Kavanagh 22 727 Atlantic Avenue 23 Boston, MA 02111-02810 (617) 357-5500 ext. 15 24 25 Co-Lead Interim Class Counsel 26 27 28

1	REED SMITH LLP
2	/s Robert D. Phillips, Jr.
3	Robert D. Phillips, Jr.
4	Tyree P. Jones, Jr.
5	David S. Reidy P. O. Box 7936
6	San Francisco, CA 94120-7936
7	Telephone: (415) 543-8700 Facsimile: (415) 391-8269
8	Attorneys for Defendant
9	Wells Fargo Bank, N.A.
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
I	

CERTIFICATE OF SERVICE

I, Andrew S. Friedman, hereby certify that a true copy of the foregoing document filed through the ECF system will be electronically sent to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those indicated as non-registered participants on July 24, 2008.

/s Andrew S. Friedman
Andrew S. Friedman

Ca	se M:08-cv-01930-MMC	Document 21-2	Filed 07/24/2008	Page 1 of 3		
1						
2						
3						
4						
5	UNITED STATES DISTRICT COURT					
6	NORTHERN DISTRICT OF CALIFORNIA					
7						
8	In re: WELLS FARGO N LENDING PRACTICES) M: 08-cv-01930-M			
9	This document relates to:) [PROPOSED] AM) ORDER ON CASE	ENDED PRETRIAL E MANAGEMENT		
10	ALL ACTIONS))			
11 12			<u></u>			
13						
14	Pursuant to stipulation by the parties,					
15	IT IS HEREBY ORDERED:					
16	1. Disclosures			ear e weeke		
17	Plaintiffs and Wells Fargo have completed the exchange of their Initial Disclosures pursuant to the Amended Pretrial Order on Case Management dated May 13,					
18	Disclosures pursuant to th	e Amended Pretri	ial Order on Case Man	agement dated May 13,		
19		t of Dloodings				
20	2. Amendment of Pleadings					
21	Plaintiffs shall inform the Court at the earliest opportunity if they intend to file any					
22	amended complaints in this Action. Any such amendments shall be completed by October 30, 2008.					
23	3. Deadlines					
24		mmence forthwith	n. The following disco	verv deadlines shall		
25	Discovery shall commence forthwith. The following discovery deadlines shall apply to the initial phase of discovery:					
26	• January 12,	·	witness cutoff for certif	fication purposes;		
27	• February 2,		tiffs' Rule 26(a)(2) ide			
28		for ce	ertification issues;	_		
			1 AN	MENDED PRETRIAL ORDER		

ON CASE MANAGEMENT

- 1			
1	•	February 9, 2009	Plaintiffs' expert witness reports due for
2			certification issues;
3	•	February 23, 2009	Wells Fargo's rebuttal disclosure and reports for
4			certification issues;
5	•	March 2, 2009	Plaintiffs' rebuttal disclosure and reports for
6			certification issues;
7	•	March 16, 2009	Expert discovery cutoff for certification issues.
8	4.	Class Certification	1
9	Plaintiffs' motion for class certification shall be heard on August 6, 2009, at 9:00		
10	a.m. The following briefing schedule shall apply to the class certification motion:		
11	•	May 4, 2009	Last day to file motion for class certification;
12	•	June 1, 2009	Last day to file opposition to class certification;
13	•	July 1, 2009	Last day to file reply briefs.
14	5. Post Class Certification Status Conference		
15	On November 11, 2009 at 10:30 a.m., the Court will hold a post-class certification		
16	status conference.		
17	6. Subsequent Discovery		
18	Plaintiffs and Wells Fargo shall adhere to the following schedule for the remainder		
19	of discover	ry:	
20	•	February 15, 2010	Fact discovery closes;
21	•	March 16, 2010	Parties' disclosure of initial expert reports;
22	•	April 19, 2010	Parties' disclosure of rebuttal expert reports;
23	•	May 19, 2010	Expert discovery closes.
24	7.	7. Dispositive Motions	
25	The Court sets the following tentative deadline for dispositive motions;		
26	•	June 8, 2010	Last day to file dispositive motions;
27	•	July 12, 2010	Last day to file opposition to dispositive motion;
28	•	August 2, 2010	Last day to file reply.
	I		_

The Court sets a hearing to consider dispositive motions for August 26, 2010. 8. **Trial Date** The Court sets October 18, 2010 as a tentative trial date. **SO ORDERED:** Dated: Hon. Maxine Chesney United States District Court Judge